REDACTED VERSION

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION
Affected Property Assessment Report Form

Cover Page

Regulatory ID number (Solid waste registration number, VCP ID number, etc) 1571

check one: [X] Initial submittal for this on-site property [ ] Subsequent submittal for this on-site property

Report date: May 5, 2005 TNRCC Region No.: 4

Reason for submittal:
- [ ] Notice of deficiency letter
- [ ] Permit
- [X] Voluntary response
- [ ] Enforcement order
- [ ] Directives letter
- [ ] Other:

TNRCC Program (check one)
- [ ] Corrective Action (Mail Code 127)
- [X] Voluntary Cleanup Program (Mail Code 221)
- [ ] Superfund State Lead (Mail Code 143)
- [ ] Superfund PRP Lead (Mail Code 143)
- [ ] Petroleum Storage Tanks (Mail Code 137)
- [ ] Municipal Solid Waste Permits (Mail Code 124)

On-Site Property Information

On-Site Property Name: Former Delfasco Forge Facility

Physical Address:

Street no. 114 Pre dir: NE Street name: 28th Street type: Street Post dir:

City: Grand Prairie County: Dallas County Code: 57 Zip: 75050

Nearest street intersection or location description: N. Main Street

Latitude: Decimal Degrees North 32.7503

Longitude: Decimal Degrees West -96.9629

Affected Off-Site Property Information

Affected Off-Site Property Name: Multiple Affected Off-Site Properties - See attached: Table 1: Affected Property (Estimated) Table

Physical Address:

Street no. Pre dir: Street name: Street type: Post dir:

City: Grand Prairie County: Dallas County Code: 57 Zip:

Attach additional page if needed to list all affected off-site properties.

[ ] Check if no off-site properties affected.

Contact Person for On-Site Property Information and Acknowledgement

Person (or company) Name: Delfasco Forge Division

Contact Person: Ms. Lynda Riekels, Ph.D. Title: Vice President

Mailing Address: 733 W. Hurst Blvd.

City: Hurst State: TX Zip: 76053 E-mail address lriekels@delfasco.com

Phone: (817) 268-0781 Fax: (817) 268-0783

By my signature below, I acknowledge the requirement of §350.2(a) that no person shall submit information to the executive director or to parties who are required to be provided information under this chapter which they know or reasonably should have known to be false or intentionally misleading, or fail to submit available information which is critical to the understanding of the matter at hand or to the basis of critical decisions which reasonably would have been influenced by that information. Violation of this rule may subject a person to the imposition of civil, criminal, or administrative penalties.

Signature of Person Lynda Riekels Name, print: Lynda Riekels Date: 5/5/05

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Summarize the assessments for all affected properties included in this report. Be sure to complete and submit the Checklist for Report Completeness. **Attach a chronology of activities associated with the referenced affected property(ies).**

On-Site Property Name: Former Delfasco Forge Facility Land use: ___ residential _X_ commercial/industrial
City: Grand Prairie County: Dallas

Does the person own the on-site property? _X_ Yes ___ No

Describe the nature of the release, estimated volume of release if known, general assessment methods, and indicate if it was an on-going or historical release, and what was done to stop the release if it was on going.

According to a Phase I Environmental Site Assessment (ESA) conducted by Environmental Consultant Services, Inc. in May 2001, the subject property was first developed in the 1950s and onsite activities consisted of munitions manufacturing and a forge operations. Delfasco Forge Division acquired the subject property in 1980 and began forge operations at that time. Detailed historical operations prior to Delfasco's acquisition are not known.

Trichloroethylene (TCE) was reportedly used onsite by Delfasco as a degreaser on metal goods. Historical information indicates TCE was used in onsite operations in small quantities by spot hand application. Used and un-used TCE were reportedly stored in 55-gallon drums onsite. Interviews with facility personnel indicated that it is possible that small spills may have occurred, but there is no documentation of any large (>25 gallon) spills. The facility has a surface linear storm drain and a former sump in the middle of the property, which could have been a receptor of any spills. In 1998, Delfasco vacated the facility and all onsite operations ceased at that time. The volume and exact nature of the release was unknown by facility personnel.

The original assessment of the release was conducted in September 2002 with a direct-push technology (DPT) rig to collect soil and groundwater samples on site. Soil samples were collected and analyzed for volatile organic compounds (VOCs), RCRA 8 Metals, and total petroleum hydrocarbons (TPH). Groundwater samples were collected and analyzed for VOCs and TPH. The VOC analysis confirmed that a historical TCE release had occurred onsite and TPH analysis revealed petroleum hydrocarbons had been released onsite. Metals analysis yielded results below calculated site specific Tier II critical PCLs and do not constitute COCs in connection with the Former Delfasco Forge Facility. Additional investigation activities have subsequently been conducted as documented in the chronology section of this APAR.

Does this report document completion of the assessment in accordance with §350.51 or is additional assessment warranted?
___ Assessment is complete _X_ Additional assessment needed. Describe additional assessment activities below:

Complete soil and groundwater PCLE zones have not been established. Additional onsite and offsite investigation activities are necessary to fully define the extent of surface and subsurface soil contamination to the appropriate assessment levels. Further offsite investigation activities are necessary to determine the aerial extent of COC affected groundwater to establish a groundwater PCLE zone. At this time, the groundwater PCLE zone has not been defined. Figures contained within this report illustrating the *estimated* PCLE zones were created by data interpolation from existing monitor wells and soil borings. However additional monitor wells and data are needed to establish a boundary along the east, southeast and west side of the COC affected groundwater plume. Additional onsite soil borings and data are needed to determine if offsite surface soils are affected by COCs above their respective assessment levels.

Is this report the only assessment report submitted to date? Yes X No – date(s) of report(s): March 2005 (Receptor Survey Report)

What are the general categories of COCs that are or have been present at the affected property?

_X_ petroleum hydrocarbons
_X_ VOCs
_____ metals
_____ other (specify):
_____ halogenated hydrocarbons
_____ pesticides
_____ inorganics (specify)

Were the COCs in each affected media defined to the assessment levels? ___ Yes _X_ No

If no, explain why the extent of the COCs was not defined, and include in the Conclusions and Recommendations section the actions that will be taken to meet these criteria.

COC affected surface soils have not yet been fully delineated and identified as isolated onsite. Interpolation of data collected to date indicate that offsite surface soils (0-15 feet bgs for residential) may by impacted by COCs. However, based on depth to groundwater and soil types in the area, it is unlikely that offsite surface soils are actually impacted. Further data collection is necessary to fully define their extent.

Due to the complexity and size of the COC affected groundwater plume in the vicinity of the Former Delfasco Forge Facility, an extensive amount of work is necessary to conduct a thorough investigation. Delfasco Forge was not able to meet the original APAR submittal deadline and requested an extension for the submittal date. TCEQ granted the original extension; however, during investigation activities it was found that the aerial extent of COC affected groundwater was quite large and extended far beyond the boundaries of the Former Delfasco Forge Facility. Delfasco Forge requested an additional extension to fully delineate the COC affected groundwater, but the extension was denied by TCEQ. Therefore, this APAR is being completed based on data collected to date and is deficient of certain data to be considered a complete APAR.

Environmental Media	Check if sampled on-site	Check if affected on-site above residential assessment levels	Check if sampled off-site	Check if affected off-site above residential assessment levels	Indicate whether the extent of COCs above the residential assessment level is stabilized or expanding							
Soil	X	X				stabilized		expanding	X	unk		
Groundwater	X	X	X	X		stabilized		expanding	X	unk		
Surface water						stabilized		expanding		unk		
Sediment						stabilized		expanding		unk		
Outdoor air						stabilized		expanding		unk		

Were all efforts made to identify potential receptors and completed or reasonably anticipated to be completed exposure pathways identified? X Yes ___ No

If no, explain why the potential receptors or pathways were not identified, and include in the Conclusions and Recommendations section the actions that will be taken to meet these criteria.

N/A

Threatened or Affected Receptors	Check if threatened	Check if affected	List the involved affected property(ies)
Water supply well (City of Grand Prairie - State Well Id #3309703)	X		28th Street & Graham Street (City of Grand Prairie)
Surface water/sediment			Surface water name:
Building (vapor impact)			Building name:
Underground utility serving as preferential transport pathway			
Underground utility not serving as preferential transport pathway			
Ecological (specify)			
Private Well (PW01)	X		(b) (9) [redacted]
Private Well (PW02)		X	
Private Well (PW03)	X		
Check if no threatened or affected receptors.			

Describe the nature of the threatened or affected receptors and any abatement/stabilization actions conducted to address the situations:

Three private wells and one public supply well were identified and reported to TCEQ in the Receptor Survey Report (3/2005). The three private wells were reported to have been historically used for irrigation purposes only. No plumbing exists from these wells to any structures and all were reported to not been used for at least 10 to 20 years. Two of the three private wells (PW01 & PW03) were dry upon inspection in August 2004. Private well (PW02) had water upon inspection and was sampled for VOCs in August 2004. TCE and daughter products were detected in this well in low-levels. TCE exceeded its residential critical PCL. A notification letter was sent to the resident of the property containing PW02, which summarized the findings and provided recommendations regarding future use of the water well.

The identified public supply well belongs to the City of Grand Prairie and is registered on the Texas Water Development Board (TWDB) database as an active well. According to Mr. Mike Nult, City of Grand Prairie – Water Utilities, the well is

only used during times of peak water demand and was confirmed to be steel cased to a depth of approximately 2,000 feet below ground surface (bgs) and screened at the bottom of the casing (2,163 bgs). This well is located beyond the northern edge of the affected groundwater plume. Due to its distance from the affected groundwater plume, its depth in comparison to the COC impacted shallow groundwater and soil addressed in this APAR, and its construction type, it is unlikely that groundwater in this well has been impacted.

Onsite surface soils are affected by COCs above residential and commercial/industrial assessment levels. Interpolation of data collected to date indicate that offsite surface soils (0-15 feet bgs for residential) may by impacted by COCs. Further delineation of surface soils is necessary to determine if offsite surface soils are a complete receptor pathway. Soils were compared to both commercial/industrial and residential critical PCLs. Because affected soils appear to affect surface soils offsite with residential properties in the immediate vicinity, the residential critical PCLs for soil were used as the assessment level for this APAR.

No abatement/stabilization efforts have been conducted to date.

Was the Tier 1 Exclusion Criteria for ecological receptors met? X Yes (passed) ___ No (failed)

Classification(s) of affected groundwater-bearing unit(s): ___ 1 X 2 ___ 3
Depth to shallowest affected groundwater-bearing unit(s): 40 feet bgs

Was notification triggered in response to an actual or probable human exposure per §350.55(e)? X Yes ___ No
If yes, describe the situation that triggered the notification requirement. Include documentation of all notifications in Appendix 12 unless previously provided, in which case indicate date provided to TNRCC.

All offsite property owners where interpolated data suggests that COC affected groundwater underlies their property were notified in June of 2004. Due to the depth of COC affected groundwater in the area, there were no known probable human exposure pathways to most of these residents. However, three private wells were identified within the COC affected groundwater plume. Two of the three wells (PW01 and PW03) were dry upon inspection. One private well (PW02) was investigated and found to contain water. This private well was sampled for VOCs, and the results indicated that COCs were present at low levels within the well.

Were all the appropriate notifications made in accordance with §350.55? X Yes ___ No
If no, explain why notifications were not made:

Were PCLs exceeded in any media? ___ No X Yes

If PCLs were exceeded, are all the PCLE zones defined? ___ Yes X No
If not, discuss the reasons this objective was not met and any alternative actions taken. Include in the Conclusions and Recommendations section the actions that will be taken to completely define the PCLE zones.

Since the discovery of COCs onsite, Delfasco has continuously conducted investigation activities to define the PCLE zones as summarized in the Chronology section included in this APAR. Although Delfasco requested and received one extension of the APAR submittal date, Delfasco found that due to the size and complexity of the COC affected groundwater plume they were not able to meet the original extension date granted by TCEQ. Delfasco subsequently submitted an additional request for an extension of the APAR submittal date in January 2005, however TCEQ denied this extension and notified Delfasco that the APAR must be submitted within 60 days of receipt of their notification letter dated February 17, 2005. Due to the unanticipated accelerated submittal date, investigation activities necessary to fully delineate the PCLE zones were not possible within the short time frame. This APAR was completed with information collected to date.

Do any of the PCLE zones extend beyond the on-site property boundary? X Yes ___ No ___ Unknown

Provide a brief description of the PCLE zones, identify the media for which a remedy is required, and describe potential impacts of the COCs at the affected property.

PCLE zones have been identified for soil and groundwater. Depth to affected groundwater (greater than 20 feet bgs) at the subject property and surrounding affected properties limits exposure. Onsite surface soils are affected; however, the greater part of the subject property is covered by concrete thus limiting access to the majority of the affected shallow soils. Interpolated onsite soil data suggests that offsite surface soils may be affected by COCs. Although all offsite soil samples are below the residential critical PCLs, these soil samples were collected a considerable distance from the Former Delfasco Forge Facility.

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If PCLs are exceeded, has a response action been completed? ___ Yes ___ No, will self-implement response action
___X___ No, will submit RAP

Conclusions and Recommendations

Describe the conclusions of the assessment.

The assessment activities to date have identified COCs in soil and groundwater at the subject property. Additionally, interpolated data indicates multiple offsite properties have COC affected groundwater and adjacent properties potentially may have COC affected surface soils. Neither the soil or groundwater PCLE zones have been fully delineated. Additional soil borings and monitor wells will be installed to define the groundwater and soil PCLE zones. Either an APAR addendum will be prepared or the additional data will be included in the response action plan (RAP).

Discuss the scope and timeframe of the next appropriate step(s) at the affected property(ies).

The scope of work for additional activities necessary to delineate the soil and groundwater PCLE zones will vary according to results of additional activities. It is projected that approximately 10 additional monitor wells and 10 to 15 soil borings will need to be installed and sampled to define the soil and groundwater PCLE zones.

Additional onsite soil borings and monitor wells may be necessary to determine the best remedial activities for these PCLE zones. Delfasco will consult with TCEQ prior to RAP submittal.